

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**KEYPOINT GOVERNMENT  
SOLUTIONS, INC.**

Plaintiff,

v.

**DANIEL J. PIERRON**

Defendant.

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**Case No. 3:17-cv-00108**

**Judge Thomas M. Rose**

**AGREED TEMPORARY RESTRAINING ORDER**

This matter is before the Court on Plaintiff KeyPoint Government Solutions, Inc.’s ("KeyPoint" and "Plaintiff"), Motion for a Temporary Restraining Order against Defendant Daniel Pierron. Pursuant to the agreement of the Parties, the Court hereby enters a Temporary Restraining Order with the terms set forth below.

**IT IS ORDERED** that Defendant Daniel Pierron (“Pierron” and “Defendant”) and any third-party to whom Defendant has disclosed or shared Plaintiff’s or its clients’ information SHALL:

1. Immediately, and no later than 48 hours after this Order, identify for KeyPoint and its counsel all KeyPoint and client information and data (including all confidential information and trade secrets of KeyPoint and its clients) Pierron maintained, transferred, or transmitted by any means without authorization during or after his employment with KeyPoint;
2. Immediately, and no later than 72 hours of this Order, and pursuant to a protocol agreed to by KeyPoint and Pierron, return to KeyPoint all KeyPoint and client information and data (including all memoranda, notes, lists, records, e- mails, computer files, and other documents and information, and all copies and versions thereof);
3. Preserve and protect in their present state from destruction, modification, or alteration all information, data, and documents

relating to KeyPoint and its clients in any form (including any information and data stored on any computers or electronic devices over which Pierron has possession, custody, or control), including, as well, the preservation and protection of all emails in any account over which he has access, and any information, documents, or data that may be relevant or discoverable in this case; and

4. Immediately produce, pursuant to a protocol agreed to by KeyPoint and Pierron, all personal, and/or home computers, servers, electronic storage devices, mobile devices, and e-mail accounts on which there has been any of KeyPoint's or its clients' information or data, or which Pierron has used to access, view, or disseminate any of KeyPoint's or its clients' information or data, and that are in his possession, custody, or control, to an authorized third-party computer forensics expert as designated by KeyPoint to review those computers, electronic storage devices, and e-mail accounts.
5. Without deleting or modifying any information on the computer, Pierron may copy all family photographs and music from his personal computer to an external hard drive prior to producing the computer for imaging. Pierron shall produce the external hard drive to the authorized third-party computer forensics expert to review the external hard drive to ensure that no KeyPoint information was copied or transferred to it.

**IT IS FURTHER ORDERED** that Pierron and any third-party to whom Defendant has disclosed or shared Plaintiff's or its clients' information SHALL NOT use or disclose to any third party, including his current employer, any material (including all documents and data) relating to KeyPoint and its clients, including KeyPoint's or its clients' confidential material and trade secrets.

**IT IS ALSO ORDERED** that this matter is set for a Preliminary Injunction hearing for the **24th day of April, 2017 at 9:30 AM.**

This Order shall be promptly filed in the Clerk's office and entered in the record. It shall continue in full force and effect until converted to a preliminary injunction, or until otherwise modified by the Court.

**IT IS SO ORDERED.**

April 13, 2017

Date

\*/Thomas M. Rose

Thomas M. Rose, U.S. District Judge